

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

JUDICIAL WATCH, INC.,

Plaintiff,

v.

COMMONWEALTH OF
PENNSYLVANIA, et. al,

Defendants.

CIVIL ACTION NO.
1:20-cv-00708-CCC

DECLARATION OF SUZANNE ALMEIDA

Pursuant to 28 U.S.C. § 1746, I, Suzanne Almeida, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am the Interim Director of Common Cause Pennsylvania. I have served in that role since March 7, 2020.
4. I also serve as Common Cause Redistricting and Representation Counsel.

5. Prior to joining Common Cause, I was the Executive Director of the League of Women Voters of Pennsylvania.

6. I have a law degree from the James E. Beasley School of Law at Temple University and an undergraduate degree from Georgia Fox University.

7. Common Cause is one of the nation's leading grassroots democracy-focused organizations and has over 1.2 million members nationwide and chapters in 35 states, including approximately 44,000 members and supporters in Pennsylvania.

8. Since 1970, Common Cause has been dedicated to the promotion and protection of the democratic process. It works to create open, honest, and accountable government that serves the public interest; to promote equal rights, opportunity and representation for all; and to empower all people to make their voices heard in the political process.

9. Common Cause of Pennsylvania's principal place of business is located in Harrisburg.

10. Many of Common Cause's approximately 44,000 members in Pennsylvania live in Bucks, Chester, and Delaware Counties.

11. Common Cause works in the areas of voter access advocacy, election protection, voter education, advocacy, outreach, get out the vote, and grassroots mobilization around voting rights.

12. Common Cause seeks to increase the level of voter registration and thereby increase the level of voter participation in Pennsylvania elections.
13. Common Cause educates voters in underserved minority communities.
14. Common Cause's members include registered voters at risk of being removed from the voter rolls if Judicial Watch is successful in this litigation.
15. If Judicial Watch succeeds in compelling unwarranted and potentially illegal "list maintenance" procedures, Common Cause will have to divert considerable resources from its election protection, advocacy, and get out the vote efforts to educate and re-register eligible voters who are purged from the voter rolls but wish to exercise their right to participate in future elections.
16. Common Cause has an interest in preventing the removal of eligible voters from the rolls, including thousands of its members and voters it may have assisted in navigating the registration process.
17. I declare under penalty of perjury that the foregoing is true and correct.

Executed this __8th__ day of June, 2020, in Harrisburg, Pennsylvania.

A handwritten signature in blue ink that reads "Suzanne Almeida". The signature is written in a cursive, flowing style.

Suzanne Almeida